

# EXHIBIT D

Nico Banks, Esq.  
Banks Law Office  
Tel.: 971-678-0036  
E-mail: [nico@bankslawoffice.com](mailto:nico@bankslawoffice.com)  
712 H St NE,  
Unit #8571,  
Washington, DC 20002  
*Attorney for Plaintiffs*

**ATTACHMENT A TO SUBPOENA:**

**DOCUMENT REQUEST (AS STATED IN SUBPOENA COVER):** All documents reflecting action upon assets or accounts held for the benefit of or controlled by, in whole or in part, any individuals or entities listed in Attachment A. “Documents” includes without limitation: account statements, wire transfer records, checks, correspondence, and account opening documents.

**INSTRUCTIONS:** This subpoena supersedes the prior subpoena issued to you in this matter. Unlike the prior subpoena now lists a physical place of compliance. Notwithstanding that physical place of compliance listed on the subpoena, all documents should be produced electronically to [nico@bankslawoffice.com](mailto:nico@bankslawoffice.com). Any questions should be directed to the same email address.

The subpoena also adds, via this attachment, some identifying information that was not included in the prior subpoena. That new identifying information is in red text below.

If the requested documents or transactional data are available in Excel format, please produce them in Excel format.

We encourage you to contact Nico Banks at [nico@bankslawoffice.com](mailto:nico@bankslawoffice.com) to discuss how we can tailor the request at issue. The aim of this subpoena is to allow Plaintiffs to identify the current location of assets that have been in Defendants’ control since May of 2022, and Plaintiffs are willing to tailor the request to achieve that goal in the least burdensome manner possible. For example, producing correspondence is likely not necessary if you produce other records that show action upon the assets at issue. Likewise, if you produce account statements that show the originating account and destination account for wire transfers and checks at issue, then Plaintiffs will likely tell you that you do not need to also produce wire confirmations or copies of the checks.

**TIME LIMITATION:** This request is limited to May of 2022 to the present.

**LIST OF INDIVIDUALS AND ENTITIES OF INTEREST, AND IDENTIFYING INFORMATION:**

**a. Ryan Carroll**

- i. Ryan Carroll's middle name is "Alexander."
- ii. His date of birth is in February of 1996.
- iii. One of his phone number is 949-315-5321
- iv. He has resided at the following addresses:
  1. 650 NE 32nd St Unit 07, Miami, FL 33137-5261
  2. 11298 Snow View Ct, Yucaipa, CA 92399-9805
  3. 24642 Charlton Dr., Laguna Hills, CA 92653
  4. 2900 NE 7<sup>th</sup> Ave Unit 2502, Miami, FL 33137
  5. 3240 Professional Drive, Auburn, CA 95602
- v. One of his email addresses is [ryancarroll96@gmail.com](mailto:ryancarroll96@gmail.com)
- vi. Last four digits of SS#: -2137
- vii. According to his tax returns, income/losses include: "various cryptocurrency trades"
- viii. He has received income from "The Giddyup Group"

**b. Max K. Day**

- i. He has resided at 18210 Farnsfield Dr., Houston, TX 77084
- ii. He was born on 6/24/1958
- iii. His wife is Lori K. Day, born on 3/31/1963
- iv. One of his email addresses is [maxday1@mac.com](mailto:maxday1@mac.com)
- v. One of his phone numbers is: (832) 330-4849
- vi. He is a life insurance agent. His license number is 2088130
- vii. He has received insurance commissions from the following companies: Quility Insurance; Transamerica Life Insurance Company; Mutual of Omaha Insurance Co; National Life Distribution;
- viii. He may have worked for the following insurance companies: Asurea; Dask LLC; Equis Financial.
- ix. He has derived income in the form of sales commissions from "Quility Holdings LLC"
- x. The last four digits of his social security number are: 7871

**c. Max O. Day**

- i. He has resided at 3118 Brandon Hill Lane, Sugar Land, TX 77479.
- ii. His wife is Marie Helene Day
- iii. The last four digits of his social security number are: 4411
- iv. He has received wages from "Improving Works, Inc." (a.k.a. "Improving – Houston" and "Improving Enterprises – Houston" and d.b.a. "Improving")

**d. Michael Day**

- i. He has resided at the following address:
  - a. 2823 Weldons Forest Dr., Katy, TX 77494

- b. 25010 Ginger Ranch Drive, Katy, TX 77494.
- c. 9550 Spring Green Blvd Ste 408-336, Katy, TX, 77494
- d. 955 Dairy Ashford Rd Ste 207, Houston, TX, 77079
- ii. Born: 3/12/1957
- iii. **The last four digits of his social security number are: 7883**
- iv. Prior spouse: Pamela Day
- v. Current spouse: Dolores Lochbaum (born 8/11/1959)
- vi. Received income from : Unum Life Insurance Company of America Third Party Plans”
- vii. Contributed to the following charities:
  - 1. Parkway Fellowship (over \$38,000)
  - 2. Focus on the Family
  - 3. YouVersion
  - 4. Star of Hope
  - 5. Billy Graham
  - 6. World Israel News
  - 7. Houston Food Bank
  - 8. Attack Poverty
  - 9. Ben Stuart Ministry
  - 10. JM Ministries
  - 11. World Vision Ministry
  - 12. Shiner's Hospitals
  - 13. Young Life Ministry
  - 14. KSBJ Christian Radio
  - 15. Voice of the Martyrs
  - 16. JCEJ of Jerusalem
  - 17. ACLJ
  - 18. Meals On Wheels
- e. **Yax Ecommerce LLC (f.k.a. “Wealth Assistants LLC” and “Carroll Enterprises LLC”) (note – we believe there are several similarly named entities that have no real distinction. Accordingly, if there is another enterprise called “Carroll Enterprise,” for example, that has similar ownership but does not have the same EIN, that is an entity controlled by the defendants)**
  - i. It has an address of 1001 Brickell Bay Dr S, Miami, FL 33131
  - ii. Other addresses for this company: 5830 E. 2d St., Suite 7000 #4224, Casper, WY 82609.
  - iii. Last four digits of EIN: -5737
  - iv. Wyoming company number: 2021-001041949
  - v. Texas branch: 1601 Elm Street Ste 4360, Dallas, TX, 75201, USA
  - vi. Texas Company number: 0805381257
  - vii. Owners: Ryan Carroll, Max K. Day, and/or Michael Day
- f. **Precision Trading Group, LLC (note the alternate names below)**
  - i. It has an address of 18210 Farnsfield Dr., Houston, TX 77084.
  - ii. Its former addresses are:
    - 1. 21223 Manor Brook Ln, Spring, TX, 77379

2. 9550 Spring Green Blvd Ste 408-336, Katy, TX, 77494
  - iii. Texas company number: 0800931979
  - iv. Owner: Max K. Day
  - v. Precision Trading Group does business as:
    - a. Mayan LLC
    - b. Proficient Supply LLC
    - c. Quantum Ecomm
    - d. WA Amazon Seller LLC
    - e. WA Band Management LLC
    - f. WA Distribution LLC
    - g. Wealth Assistants LLC
  - vi. A partner of Precision Trading Group LLC is Business Financial Solutions Advisory LLC.
  - vii. Another partner is Max K. Day of 18210 Farnsfield Drive, Houston, TX 77084
  - viii. 2022 tax return lists as “current assets” the following companies:
    2. Business Financial Solutions
    3. Dask LLC
    4. HouTex Farm
    5. Max Pro Marketing
    6. Wealth Assistants
  - ix. 2022 tax return lists “brokerage investments” as “other investments”
- g. WA Distribution LLC**
- i. It has an address of 1912 Capitol Avenue, Suite 500, Cheyenne, WY 82001.
  - ii. Wyoming company number: 2022-001167610
  - iii. North Carolina branch address: 4030 Wake Forest Road, Ste 349, Raleigh, NC 27609
  - iv. North Carolina company number: 2639981
  - v. It is owned by Ryan Carroll
- h. Providence Oak Properties, LLC**
- i. Its agent’s address is: Nevada Corporate Headquarters, Inc., 4730 S. Fort Apache Rd, Suite 300, Las Vegas, NV 89174.
  - ii. Its Nevada Corporate Number is: E0256042016-4
  - iii. It is managed by Max K. Day
- i. WA Amazon Seller LLC**
1. Attorney of record: Mac Leckrone.
  2. Address: 11807 Westheimer Rd Ste. 550 Houston, TX 77077
  3. Wyoming Company Number: 2022-001151805
- j. MKD Investment Advisor;**

1. It is clear that MKD Investment Advisor is Max K. Day's alter ego not only because of its name but also because MKD Investment Advisor is the registered owner of Max K. Day's home.
2. Address: 1712 Pioneer Ave., Ste 2207, Cheyenne, WY 82001
3. Wyoming company number: 2022-001148781

**k. MKD Family Beneficiary;**

1. It is clear that MKD Family Beneficiary is Max K. Day's alter ego not just because of the initials at the beginning of the corporate name, but also because it has the same registered address as MKD Investment Adviser.
2. Address: 1712 Pioneer Ave., Ste 2207, Cheyenne, WY 82001
3. Wyoming Company Number: 2022-001148776

**l. MKD Family Private Management Company;**

1. It is clear that MKD Family Beneficiary is Max K. Day's alter ego not just because of the initials at the beginning of the corporate name, but also because it has the same registered address as MKD Investment Adviser.
2. Address: 1712 Pioneer Ave., Ste 2207, Cheyenne, WY 82001
3. Wyoming company number: 2022-001152671

**m. Max Day Consulting**

1. Address: 18210 Farnsfield Dr., Houston, TX 77084
2. Wyoming company number: 0803024903

**n. "Yax IP and Management Inc.," a.k.a. "Pithy Productions" d.b.a. "Fulfillable"**

1. It is clear that Yax IP/Fulfillable is Wealth Assistants' alter ego for the following reasons: (1) it has the same attorney of record (Mac Leckrone) as many of the Defendant entities; (2) it also has the same registered agent ("Cogency Global Inc.") as many of the defendant entities; (3) its name's prefix ("Yax") matches the prefix of the current name of Wealth Assistants LLC (which changed its corporate name to "Yax Ecommerce"); (4) a press release indicates that "Max Day" is the "CEO of Fulfillable."
2. Address: PO Box 1505 Austin, TX 78767
3. Texas Company number: 0155531200
4. Attorney of record: Mac Leckrone

**o. HouTex Farm Equity Partners LLC (a.k.a. Houtex Crickett Farm)**

1. While HouTex is purportedly a cricket farm, according to its corporate registration, it is managed by Max K. Day and has the same registered address as Defendant Precision Trading Group, LLC (18210 Farnsfield Dr., Houston, TX 77084).

2. HouTex Farm has the following website:  
<https://www.houtexfarm.com/>. The website recently began listing “**Todd Bradley**” as the owner. But in reality, HouTex Farm Equity Partners appears to be a shell company owned by Max K. Day.
3. The business’s website recently began stating that the cricket farm is located at a shed beside 28344 Rose Ln., Katy, TX 77494.
4. Texas Company number: 0804024347

**p. Business Financial Solutions Advisory LLC**

1. Defendant Max K. Day is the manager of this corporation. It has the same address as the defendant entities managed by Max K. Day (18210 Farnsfield Dr., Houston, TX 77084).
2. Its former addresses are:
  - a. 2510 Las Posas Rd Ste G, Camarillo, CA 93010
  - b. 1860 Fm 359 Rd # 122, Richmond, TX, 77406
3. Company number: 0802951719

**q. Evo Maxx LLC**

1. Max Day (either Defendant Max K. Day or Defendant Max O. Day) is the manager of this corporation. The attorney of record is **Feras Mousilli**, who is the principal of the law firm that is the attorney of record on many of the entity defendants’ corporate registrations. The agent is Cogency Global Inc., which is the same agent as many of the entity defendants’ corporate registrations.
2. Address: 11807 Westheimer Rd Ste. 550 Houston, TX 77077

**r. Daddy Jules LLC, f.k.a. RNJ Enterprise LLC, California Entity Number 202104310030**

1. The corporation lists Ryan Carroll—residing at his address of 11298 Snow View Ct, Yucaipa, CA 92399—as a manager and member of the corporation. The only other manager is “Julia Mata” who was another employee of Wealth Assistants. The organizer is “Lovette Dobson” who is the same individual who organized other Wealth Assistants entities.
2. Address: 3400 Cottage Way, Ste G2 #4996, Sacramento, CA 95825
3. Texas company number: 202104310030

**s. Dreams To Reality**

1. EIN ends in -4281
2. The members are Ryan Carroll and Julia Matta – both Wealth Assistants employees

**t. WWKB, LLC**

1. Defendant Michael Day owns this corporation.

2. **Address:** 25010 Ginger Ranch Dr, Katy, TX, 77494
3. **Agent address:** 2823 Weldons Forest Dr, Katy, TX, 77494, USA  
(agent is Michael Day)
4. **Texas Company number:** 0804344622

**u. Profit Zone LLC**

1. **Directors:** Max K. Day and Michael Day
2. **Address:** 1860 Fm 359 Rd # 122, Richmond, TX 77406
3. Texas company number: 0800662495

**v. Fidelis Trading, LLC**

1. Similarly named corporations under common ownership: "Fidelis Trading, Intl."
2. Owners: Max K. Day and Michael Day
3. Address: 18210 Farnsfield Dr, Houston, TX, 77084
4. Alternate address: 1450 W Grand Pkwy S Ste G-448, Katy, TX, 77494
5. Texas company number: 080093099

**w. Fidelis Capital Investments Limited Liability Company**

1. Address: Cinco Village Center Blvd # 200, Katy, TX 77494 (same as ProFusion Marketing)
2. **Agent:** Christopher Lopez
3. **Manager:** Jayson Lopez (both Christopher and Jayson listed their address as 3085 Sunset Ln, Cocoa, FL, 32922-6658)
4. **Principal:** Michael Day
5. **Florida company number:** L14000121402

**x. ProFusion Marketing LLC**

1. Address: 18210 Farnsfield Dr, Houston, TX, 77084
2. Alternate address: Cinco Village Center Blvd # 200, Katy, TX, 77494
3. Manager: Max O. Day
4. Officer: Terry Vanderpool
5. Texas company number: 0800515374

**y. Maxpro Marketing**

1. Address: 18210 Farnsfield Dr, Houston, TX, 77084
2. Alternate address: 2510 Las Posas Rd Ste G, Camarillo, CA, 93010
3. Texas company number: 0705334322

**z. Global Market Investment Club**

1. Address: 955 Dairy Ashford St Ste 207, Houston, TX, 77079
2. Treasurer and secretary: Michael Day
3. Company number: 0706826322

**aa. Max Family Ltd.**

1. 19219 Cypress Cliff Dr, Katy, TX, 77449

2. Alternate Address: 1555 Hoveden Dr, Katy, TX, 77450
3. Texas corporate number: 0006081210
4. Directors/Officers: Max K. Day and Mike Day

**bb. Southwestern Media Group, Inc.**

1. Owner: Michael Day
2. Address: 955 Dairy Ashford Rd Ste 106, Houston, TX, 77079
3. Texas corporate number: 0120547500

**cc. Teamwork 2 Wealth, LLC**

1. Owner: Max K. Day
2. Agent: Michael Day
3. Address: 1450 W Grand Pkwy S Ste G-448, Katy, TX, 77494
4. Texas company number: 0801006328

**dd. Today's Destiny, Inc. (D.B.A. TNG Systems)**

1. Address: C/O Joseph M Hill, Trustee 5851 San Felipe Houston, TX, 77057
2. Trustee: Joseph M. Hill
3. President: Michael Day
4. Agent: Terry Vanderpool
5. Alternate spellings: "Today S Destiny Inc"

**ee. Today's Construction & Remodeling, Inc.**

1. Address: 955 Dairy Ashford St Ste 207, Houston, TX, 77079
  - a. Owned by "Keilers Co." or something similar since 2008
2. Texas company number: 0143152330
3. Director: Michael Day

**ff. Teamwork Investments, L.L.C. (a.k.a. Merchant Services International, L.L.C.)**

1. Address: 955 Dairy Ashford Rd Ste 106, Houston, TX, 77079
2. President and Secretary: Michael Day
3. Agent: Terry Vanderpool

**gg. Today's Investment Strategies, LLC (a.k.a. Today's Investment Strategies)**

1. Address: 955 Dairy Ashford Rd Ste 207, Houston, TX, 77079
2. Texas company number: 0800249541
3. President: Michael Day
4. Agent: Terry Vanderpool
5. Alternate spelling "Today S Investment Strategies LLC"

**hh. Today's Network Group, Inc. (a.k.a. "TNG" or "T&G")**

1. Address: 955 Dairy Ashford St Ste 207, Houston, TX, 77079
2. Directors: Max Day and Michael Day
3. Texas company number: 0124363000

**ii. Today's Construction & Remodeling, Inc.**

1. Address: 955 Dairy Ashford Rd Ste 207, Houston, TX, 77079

2. Texas company number: 0143152300
3. Director: Michael Day

**jj. E-Universe Marketing, Inc.**

1. Address: 955 Dairy Ashford Rd Ste 207, Houston, TX, 77079
2. Directors: Michael Day, Terry Vanderpool
3. Texas company number: 0156276800

**kk. Michael Family Ltd.**

1. Address: 1555 Hoveden Dr, Katy, TX, 77450
2. Texas corporation number: 0006081110

**ll. Cattlemen Casualty Corp.**

1. This is a captive insurance company that lists Max K. Day, Michael Day, and Ryan Carroll as its board of directors (the same individuals who own Wealth Assistants). Its contact information includes emails with “@wealthassistants.com” email addresses.
2. The address is: 2401 12th Ave. NW, 117-207, Ardmore, OK 73401

mm.

**Diamondsil Llc**

1. Texas corporation number: 0707980622
2. Address: 955 Dairy Ashford St Ste 207, Houston, TX 77079
3. President: Mike Day
4. Treasurer: Max Day

**nn. DASK**

1. According to Max K. Day’s tax return, he derives income from this business.
2. Address: 18210 Farnsfield Drive, Houston, TX 77084

**oo. “Proficient Company”**

1. Wealth Assistants’ 2022 tax return indicates it made an investment of \$2.5 million in “Proficient Company” (see JD 348)

**pp. “USA Movements LLC”**

1. Last four digits of EIN: -4485
2. Owner: Ryan Carroll

**qq. Smart Heart Skin LLC**

1. Owner: Ryan Carroll
2. Address: 27068 LA PAZ RD # 541, ALISO VIEJO, CA, 92656

**rr. Thumbnail Designs Inc.**

1. Owner: Lori Day (wife of Max K. Day)
2. Address: 20548 VENTURA BLVD APT 312, WOODLAND HILLS, CA, 91364

**ss. Carroll Private Management Company**

1. Owner: Ryan Carroll

**tt. Start Scale Exit LLC**

1. Owner: Ryan Carroll

**uu. WA Brand Ventures LLC**

1. DBA: Wealth Assistants

**vv. Day Co Interest, LLC**

1. Owner: Michael Day

You may also be able to identify Defendants' bank accounts by searching for transfers from their known bank accounts. We know that Defendants used the following bank accounts because Defendants' victims made payments to Defendants to these bank accounts:

| <b>Bank Name</b>                               | <b>Last Four Digits of Account Number</b> | <b>Name of Account Holder</b>         |
|--|---|---------------------------------------|
| Wells Fargo                                    | -2209                                     | Wealth Assistants LLC                 |
| Bank of America                                | -4905                                     | Wealth Assistants LLC                 |
| Thread Bank                                    | -3710                                     | Wealth Assistants LLC                 |
| Thread Bank                                    | -1234                                     | Wealth Assistants LLC                 |
| Thread Bank                                    | -1235                                     | Wealth Assistants LLC                 |
| Thread Bank                                    | -1236                                     | Wealth Assistants LLC                 |
| Thread Bank                                    | -0635                                     | WA Distribution LLC                   |
| Evolve Bank & Trust (now known as Thread Bank) | -6732                                     | WA Amazon Seller LLC                  |
| Thread Bank                                    | -1447                                     | WA Amazon Seller LLC                  |
| JP Morgan Chase Bank NA                        | -5952                                     | Wholesale Universe Inc.               |
| Bank of America                                | -5118                                     | Michael Day                           |
| Bank of America                                | -0545                                     | Dolores Laree Lochbaum-Day            |
| Bank of America                                | -8978                                     | Michael Day                           |
| Credit Carma                                   | unknown                                   | Michael Day                           |
| Coinbase                                       | unknown                                   | Michael Day                           |
| AMEGY BANK                                     | unknown                                   | Michael Day                           |
| LIVE OAK BANK                                  | -2314                                     | DayCo Interest LLC                    |
| LIVE OAK BANK                                  | -7575                                     | MLD Family Private Management Company |
| TRUIST BANK                                    | -5565                                     | EVO MAXX LLC                          |

|                              |       |  |
|------------------------------|-------|--|
| Wells Fargo                  | -6864 | Business Financial Solutions Advisory      |
| Prosperity Bank              | -6097 | Myan LLC                                   |
| Prosperity Bank              | 5899  | Cattleman Casualty Corporation LLC         |
| TD Bank                      | -2968 | Houtex Crickett Farms                      |
| Bank of America              | 4053  | Dask LLC                                   |
| Choice Financial Group       | 5066  | MKD Family Private Management Company, LLC |
| Digital Federal Credit Union | 5504  | Max K. Day                                 |
| Wells Fargo                  | 9026  | Lori Day                                   |
| Wells Fargo                  | 0651  | Lori Day                                   |
| Priority Union Trust         | 4607  | Lori Day                                   |
| JP Morgan Chase Bank NA      | -1339 | Max O. Day                                 |
| JP Morgan Chase Bank NA      | -7290 | Max O. Day DBA Teamwork Strategies         |
| Mercury Bank                 | -6340 | Teamwork Strategies LLC                    |
| Lili Bank                    | -4000 | Teamwork Strategies LLC                    |
| Wells Fargo                  | -2255 | Pithy Productions Inc (D.B.A. Fulfillable) |
| Wells Fargo                  | 7394  | Precision Trading Group                    |
| First Citizens Bank          | 3241  | Providence Oak Properties                  |
| Wells Fargo                  | 8580  | Precision Trading Group                    |
| Wells Fargo                  | 2191  | Precision Trading Group                    |
| Wells Fargo                  | 2183  | Precision Trading Group                    |
| Wells Fargo                  | 2209  | Precision Trading Group                    |
| Wells Fargo                  | 2373  | Precision Trading Group                    |
| Wells Fargo                  | 2365  | Precision Trading Group                    |
| Mercury Bank                 | 1626  | Start Scale Exit LLC                       |
| Thread Bank                  | 0635  | WA Distribution LLC                        |
| Thread Bank                  | 4085  | WA Distribution LLC                        |
| Bank of America              | 3039  | Yax Ecommerce LLC                          |
| Bank of America              | 0434  | Yax Ecommerce LLC                          |
| Bank of America              | 4905  | Yax Ecommerce LLC                          |
| Bank of America              | 1268  | WA Brand Management LLC                    |
| Thread Bank                  | 6732  | WA Amazon Seller LLC                       |
| Thread Bank                  | 1447  | WA Amazon Seller LLC                       |
| Thread Bank                  | 1449  | WA Amazon Seller LLC                       |
| Thread Bank                  | 1409  | WA Brand Ventures LLC                      |
| Thread Bank                  | 1256  | WA Brand Ventures LLC                      |
| Thread Bank                  | 1256  | WA Brand Ventures LLC                      |

|                      |         |                   |
|----------------------|---------|-------------------|
| Coinbase             | Unknown | Ryan Carroll      |
| Bank of America      | 8704    | Dreams to Reality |
| Bank of America      | 8681    | Dreams to Reality |
| Bank of America      | 8720    | Dreams to Reality |
| Bank of America      | 8694    | Dreams to Reality |
| Coinbase             | Unknown | Michael Day       |
| Bank of America      | Unknown | WWKB, LLC         |
| Day Co Interest, LLC | Unknown | “Ameritrade”      |